

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civ. No. 20-287

\$13,500.00 IN UNITED STATES CURRENCY,

Defendant-in-rem.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

Plaintiff, United States of America, brings this complaint in accordance with Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action to forfeit and condemn to the use and benefit of the United States of America property involved in violations of the Controlled Substances Act and 18 U.S.C. § 1952 that is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(C).

DEFENDANT *IN REM*

2. The defendant in rem consists of the following:

i. Thirteen Thousand Five Hundred Dollars (\$13,500.00) in United States Currency (hereafter referred to as “Defendant Currency”).

3. Defendant Currency was seized by the U.S. Department of Homeland Security, U.S. Customs and Border Protection, on December 15, 2019, in the District of New Mexico.

4. Defendant Currency is now, and during the pendency of this action will be, in the jurisdiction of this Court.

JURISDICTION AND VENUE

5. The United States District Court for the District of New Mexico has subject matter jurisdiction under 28 U.S.C. §§ 1345, 1355(a) and 1356.

6. Venue for this civil forfeiture action is proper in this district pursuant to 28 U.S.C. §§ 1355 and 1395, as acts or omissions giving rise to the forfeiture took place in this district and the property is found in this district. Upon the filing of this complaint, Defendant Currency will be arrested by execution of a Warrant for Arrest *In Rem* in the District of New Mexico.

FACTS

7. On December 15, 2019, U.S. Border Patrol Agent (“BPA”) Dakota Reynolds was working the vehicle inspection lanes at the U.S. Border Patrol checkpoint located on Interstate 10 west of Las Cruces, New Mexico. At approximately 9:30 p.m., BPA Reynolds encountered a black 2014 Mercedes CLA 250 bearing California license plates as it approached the primary inspection area.

8. BPA Reynolds greeted the driver of the vehicle, and as the driver rolled down his window, BPA Reynolds immediately smelled a strong odor of marijuana emanating from the vehicle.

9. BPA Reynolds then asked the driver, identified as Lucas Da Costa Alves (“Da Costa”), about his travel plans. Da Costa replied that he was coming from Texas and heading to California.

10. Based on the marijuana odor, BPA Reynolds asked Da Costa for consent to run a canine sniff of the vehicle. Da Costa hesitated at first, but eventually consented.

11. BPA Reynolds directed Da Costa to secondary inspection, where BPAs asked Da Costa to exit the vehicle. Upon exiting the vehicle, Da Costa exclaimed that he smoked weed, and confessed that there was marijuana located in the center console of the vehicle.

12. BPA Reynolds then conducted a canine inspection of the vehicle using his government-assigned narcotics detection dog, Cobo. During the inspection, Cobo alerted positively for the odor of illegal controlled substance on two separate occasions. First, he alerted to the center console of the vehicle. In addition, Cobo alerted to a black backpack located on the passenger seat.

13. BPA Reynolds advised Da Costa of the positive canine alert, and asked again where the marijuana was in the vehicle. Da Costa reiterated that the marijuana was in the center console. At that point, BPAs escorted Da Costa into the I-10 checkpoint holding cell for further investigation.

14. BPAs then conducted a search of the vehicle and discovered a Glock .45 ACP magazine loaded with twelve (12) rounds in a shoebox in the vehicle's trunk, two black canisters containing .01 grams of marijuana in the center console, and a large amount of U.S. currency secreted in the backpack on the vehicle's front seat.

15. Inside the backpack, BPA Reynolds found \$13,500 in U.S. currency wrapped in rubber bands inside a vacuum-sealed bag that had been previously opened. The currency was separated into thirteen \$1,000 bundles and one bundle of \$500 which consisted entirely of \$20 dollar bills.

16. Based on his training and experience, BPA Reynolds considered both the manner of the currency's storage as well as its separation into distinct bundles to be consistent with the transportation of proceeds derived from unlawful drug trafficking activity.

17. BPAs then interviewed Da Costa regarding the currency, and Da Costa gave varying, inconsistent accounts of the currency's origin. Da Costa related to one BPA that he earned the money as a barber. When asked where the money came from by another BPA, Da Costa replied that he earned the money with his cousins as a mover. When asked how he earned such a large sum of money on another occasion, Da Costa stated that he "help[ed] a lot of people." Throughout the interview, Da Costa remained bellicose and confrontational with BPAs.

18. At no time during the interview was Da Costa able to produce a receipt, bank statement, photograph, reference, or documentation to substantiate any legitimate source for the currency.

19. Finally, BPAs conducted a sterile test on the currency. To accomplish this, BPAs sent the drug odor detector dog, Cobo, into a sterile environment containing only sterile containers. Cobo did not alert. BPAs then concealed the currency seized from Da Costa's backpack into the sterile environment and sent Cobo to perform another systematic canine search. Cobo alerted positively for the odor of illegal controlled substance in the container concealing the currency.

FIRST CLAIM FOR RELIEF

20. The United States incorporates by reference the allegations in paragraphs 1 through 19 as though fully set forth.

21. Title 21, United States Code, Section 881(a)(6) subjects to forfeiture "[a]ll moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable

instruments, and securities used or intended to be used to facilitate any violation of this subchapter.”

22. Defendant Currency was furnished, or intended to be furnished, in exchange for a controlled substance, or constitutes proceeds traceable to such an exchange, or was used or intended to be used to facilitate a violation of the Controlled Substances Act and is thus subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6).

SECOND CLAIM FOR RELIEF

23. The United States incorporates by reference the allegations in paragraphs 1 through 19 as though fully set forth.

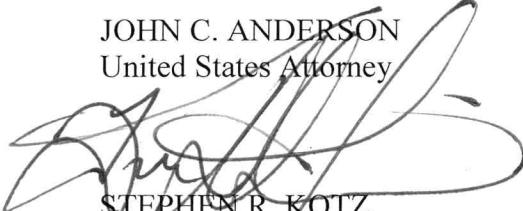
24. Title 18, United States Code, Section 1952 prohibits interstate and foreign travel or transportation with the intent to (1) distribute the proceeds of any unlawful activity; (2) commit any crime of violence to further any unlawful activity; or (3) otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity. Unlawful activity is defined in 18 U.S.C. § 1952(b).

25. Defendant Currency is the proceeds of a violation of 18 U.S.C. § 1952 or is the proceeds traceable to such property and, is thus subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE: Plaintiff seeks arrest of Defendant Currency and forfeiture of same to Plaintiff, determination of the validity and priority of claims of the Claimants and any Unknown Claimants to the Defendant Currency, costs and expenses of seizure and of this proceeding, and other proper relief.

Respectfully submitted,

JOHN C. ANDERSON
United States Attorney

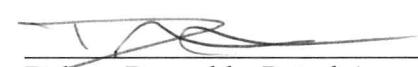

STEPHEN R. KOTZ
KRISTOPHER DALE JARVIS
Assistant U.S. Attorneys
200 N. Church Street
Las Cruces, NM 88001
(575) 522-2304

28 U.S.C. § 1746 DECLARATION

I am a Special Agent with the Department of Homeland Security, U.S. Customs and Border Protection who has read the contents of the Complaint for Forfeiture *In Rem* to which this Declaration is attached; and the statements contained in the complaint are true to the best of my knowledge and belief.

I declare under penalty of perjury and the laws of the United States of America that this Declaration is true and correct, except as to matters stated on information and belief, and as to those matters I believe them to be true.

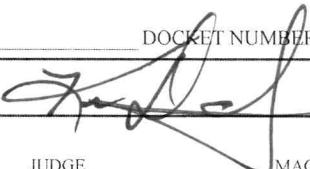
Dated: 03/30/20



Dakota Reynolds, Patrol Agent
U.S. Border Patrol

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS United States of America		DEFENDANTS \$13,500.00 in United States Currency																										
(b) County of Residence of First Listed Plaintiff <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>		County of Residence of First Listed Defendant <i>(IN U.S. PLAINTIFF CASES ONLY)</i>																										
(c) Attorneys (Firm Name, Address, and Telephone Number) Kristopher Dale Jarvis, Assistant United States Attorney 200 N. Church Street, Las Cruces, NM 88001 575-522-2304		Attorneys <i>(If Known)</i>																										
II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i>		III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i>																										
<input checked="" type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i>	Citizen of This State	<input type="checkbox"/> PTF 1 <input type="checkbox"/> DEF 1 Incorporated or Principal Place of Business In This State																									
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i>	Citizen of Another State	<input type="checkbox"/> PTF 2 <input type="checkbox"/> DEF 2 Incorporated and Principal Place of Business In Another State																									
		Citizen or Subject of a Foreign Country	<input type="checkbox"/> PTF 3 <input type="checkbox"/> DEF 3 Foreign Nation																									
IV. NATURE OF SUIT <i>(Place an "X" in One Box Only)</i>		Click here for: Nature of Suit Code Descriptions.																										
<table border="1"> <tr> <td>CONTRACT</td> <td>TORTS</td> <td>FORFEITURE/PENALTY</td> <td>BANKRUPTCY</td> <td>OTHER STATUTES</td> </tr> <tr> <td> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise </td> <td> PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - 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				<input type="checkbox"/> 8 Multidistrict Litigation - Direct File																								
VI. CAUSE OF ACTION		Cite the U.S. Civil Statute under which you are filing <i>(Do not cite jurisdictional statutes unless diversity)</i> : 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(C)																										
		Brief description of cause:																										
VII. REQUESTED IN COMPLAINT:		<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.		DEMAND \$																								
				CHECK YES only if demanded in complaint: JURY DEMAND: <input type="checkbox"/> Yes <input type="checkbox"/> No																								
VIII. RELATED CASE(S) IF ANY		<i>(See instructions):</i>		JUDGE DOCKET NUMBER																								
DATE 03/27/2020		SIGNATURE OF ATTORNEY OF RECORD																										
FOR OFFICE USE ONLY																												
RECEIPT #	AMOUNT	APPLYING IFFP	JUDGE	MAG. JUDGE																								